

Laurence F. Padway, #89314
LAW OFFICES OF LAURENCE F. PADWAY
1516 Oak Street, Suite 109
Alameda, California 94501
Telephone: (510)814-0680
Facsimile : (510)814-0650

Attorneys for Plaintiff Salima Abdullah

SEDGWICK, DETERT, MORAN & ARNOLD LLP
REBECCA A. HULL Bar No. 99802
ERIN A. CORNELL Bar No. 227135
rebecca.hull@sedgwicklaw.com
erin.cornell@sedgwicklaw.com
333 Bush Street, 30th Floor
San Francisco, California 94104
Telephone: (415) 781-7900
Facsimile: (415) 781-2635

Attorneys for Defendant AccentCare Long Term Disability Plan and
Real Party in Interest Metropolitan Life Insurance Company

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SALIMA ABDULLAH

Plaintiff,

v.

ACCENTCARE LONG TERM
DISABILITY PLAN,

Defendant.

METROPOLITAN LIFE INSURANCE
COMPANY,

Real Party in Interest.

CASE NO. C 09-02909 MMC

STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE DATE FOR FILING JOINT
STATEMENT

Plaintiff Salima Abdullah (“plaintiff”), defendant AccentCare Long Term Disability
Plan (“Plan”) and Real Party in Interest Metropolitan Life Insurance Company (“MetLife”)
(collectively “defendants”), through their respective attorneys of record herein, hereby stipulate

1 and agree, and respectfully request that the Court order, that the date for the parties to file their
2 joint statement shall be extended one week from November 2, 2012 to November 9, 2012.

3 On September 19, 2012, the Court issued its Order Granting Plaintiff's Motion for
4 Judgment and Denying Defendant's Cross-Motion for Judgment. (ECF No. 63, hereinafter
5 "Order".) The Order directed the parties to jointly submit a proposed judgment; or in the
6 alternative, if the parties could not come to an agreement regarding the amount or form of
7 judgment, to submit a joint statement setting forth their respective positions. (ECF No. 63,
8 23:27-22:3.) The parties were ordered to submit a proposed judgment or joint statement no
9 later than November 2, 2012. (*Id.*)

10 The parties have come to an agreement on some issues but outstanding issues remain to
11 which the parties do not agree. The parties have been working together to prepare a joint
12 statement for filing on November 2, 2012. However, defendants' client representative is
13 located in New York City, and due to Superstorm Sandy earlier this week, communications
14 with their client representative have been difficult. Defendants' client representative has not
15 been able to complete the review and approval process with regard to the joint statement. Due
16 to these very unusual circumstances, the parties agree that good cause exists for the one-week
17 extension for them to file the joint statement.

18 SO STIPULATED AND AGREED, AND RESPECTFULLY REQUESTED:

19 DATED: November 2, 2012 LAW OFFICES OF LAURENCE F. PADWAY

20
21 By:/s/ Laurence F. Padway (as authorized 11/2/12)
22 Laurence F. Padway
Attorney for Plaintiff Salima Abdullah

23 DATED: November 2, 2012 SEDGWICK, DETERT, MORAN & ARNOLD LLP

24
25 By:/s/ Erin A. Cornell
26 Rebecca A. Hull
27 Erin A. Cornell
28 Attorneys for Defendant AccentCare Long Term
Disability Plan and Real Party in Interest
Metropolitan Life Insurance Company

ORDER

Having considered the parties' Stipulation, and good cause appearing, it is hereby ORDERED that the last day for the parties to file their joint statement is continued one week to November 9, 2012.

IT IS SO ORDERED.

DATED: November 1, 2012



HONORABLE MAXINE M. CHESNEY
UNITED STATES DISTRICT JUDGE